

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013**REDACTED - FOR PUBLIC INSPECTION**

<010> Study Area Code	330936
<015> Study Area Name	INDIANHEAD TEL CO
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Tom Campbell
<035> Contact Telephone Number: Number of the person identified in data line <030>	6516218511 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	tcampbell@otcpas.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; padding: 2px;">330936WI510.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; padding: 2px;">330936WI610.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010> <div style="border: 1px solid black; padding: 2px;">330936WI1010.pdf</div>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(100) Service Quality Improvement Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	330936
<015>	Study Area Name	INDIANHEAD TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	Tom Campbell 6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com
<110>	Has your company received its ETC certification from the FCC?	<input checked="" type="radio"/> (yes / no)
<111>	If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<input type="radio"/> (yes / no)

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

330936WI112.pdf, 330936WI112.docx

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	<input type="radio"/> Yes
<114>	Report how much universal service (USF) support was received	<input type="radio"/> Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	<input type="radio"/> Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	<input type="radio"/> Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	<input type="radio"/> Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	<input type="radio"/> Yes

## July 2013

[illegible]

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**(700) Price Offerings including Voice Rate Data  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	330936
<015>	Study Area Name	INDIANHEAD TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

<701>	Residential Local Service Charge Effective Date	1/1/2015
<702>	Single State-wide Residential Local Service Charge	

[illegible]



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[illegible]

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	330936
<015>	Study Area Name	INDIANHEAD TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

<910>	Tribal Land(s) on which ETC Serves	Lac Courte Oreilles Band of Lake Superior Chippewa
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<920>	Tribal Government Engagement Obligation	330936w1920.pdf	Name of Attached Document
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If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

(1100) No Terrestrial Backhaul Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	330036
<015>	Study Area Name	INDIANHEAD TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).



(1200) Terms and Condition for Lifeline Customers		FCC Form 481
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form		July 2013

<010>	Study Area Code	330936
<015>	Study Area Name	INDIANHEAD TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	<div>330936WI1210.pdf</div> <div>Name of Attached Document</div>
<1220>	Link to Public Website	HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	330936
<015>	Study Area Name	INDIANHEAD TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516216511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting	
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)i}
<2011a>	3rd Year Certification {47 CFR § 54.313(b)(1)ii}
<2011b>	Attachment {47 CFR § 54.313(b)(1)ii}
Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}	
<2012>	2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
<2013>	2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
<2014>	2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
<2015>	2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}
Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	
<2016>	Certification Support Used to Build Broadband
Connect America Phase II Reporting {47 CFR § 54.313(e)}	
<2017>	3rd year Broadband Service Certification
<2018>	5th year Broadband Service Certification
<2019>	Interim Progress Certification
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021>	Interim Progress Community Anchor Institutions
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Name of Attached Document(s) Listing Required Information

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(3000) Rate Of Return Carrier Additional Documentation

Form 102

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	330936
<015>	Study Area Name	INDIANHEAD TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@ot-qbas.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan		
	Milestone Certification (47 CFR § 54.313(f)(1)(ii))	330936WI3010.pdf	Name of Attached Document Listing Required Information
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input checked="" type="checkbox"/>	
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	330936WI3012.pdf	Name of Attached Document Listing Required Information
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<input checked="" type="checkbox"/>	(Yes/No)
(3014)	If yes, does your company file the RUS annual report	<input checked="" type="checkbox"/>	(Yes/No)
	Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>	
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation		
(3018)	If the response is no on line 3014, Is your company audited?	<input checked="" type="checkbox"/>	(Yes/No)
	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<input checked="" type="checkbox"/>	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>	
(3021)	Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit	<input checked="" type="checkbox"/>	
	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:		
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<input type="checkbox"/>	
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>	
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>	
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3026)	Attach the worksheet listing required information	330936w13026.pdf	Name of Attached Document Listing Required Information

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(3000) Rate Of Return Carrier Additional Documentation (Continued)

Return 102

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Data Collection Form

<010>	Study Area Code	330936
<015>	Study Area Name	INDIANHEAD TEL CO
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<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
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<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

Financial Data Summary	
(3027) Revenue	30365190
(3028) Operating Expenses	27606783
(3029) Net Income	1021133
(3030) Telephone Plant In Service(TPIS)	118965244
(3031) Total Assets	80760390
(3032) Total Debt	3500384
(3033) Total Equity	63172206
(3034) Dividends	40000

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	330936
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<039> Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	330936
<015> Study Area Name	INDIANHEAD TEL CO
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<039> Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>Tom Campbell</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Tom Campbell
Name of Reporting Carrier:	INDIANHEAD TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/29/2015
Printed name of Authorized Officer:	William Eckles
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	5075263252 ext.
Study Area Code of Reporting Carrier:	330936 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	INDIANHEAD TEL CO
Name of Authorized Agent or Employee of Agent:	Tom Campbell
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/25/2015
Printed name of Authorized Agent or Employee of Agent:	Tom Campbell
Title or position of Authorized Agent or Employee of Agent:	Consultant
Telephone number of Authorized Agent or Employee of Agent:	6516218511 ext.
Study Area Code of Reporting Carrier:	330936 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

*Attachments*

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(700) Price Offerings including Voice Rate Data

# Data Collection Form

FCC Form 481

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July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

	Residential Local Service Charge Effective Date	1/1/2015
<701>	Residential Local Service Charge	
<702>	Single State-wide Residential Local Service Charge	

<703>

[illegible]



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[illegible]

REDACTED – FOR PUBLIC INSPECTION

[illegible]

SAC: 330936

**REDACTED – FOR PUBLIC INSPECTION**

State: WI

Indianhead Tel Co

Form 481 Line No. 112 Five Year Service Quality Improvement Plan

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**ATTACHMENT REDACTED IN ENTIRETY**

SAC: 330936

State: Wisconsin

Indianhead Tel Co

Form 481 Line No.: 510 Compliance with Service Quality Standards and Consumer Protection

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As required by the Wisconsin Public Service Commission (PSC) Chapter 165 Rules, the local services provided by Indianhead Tel Co are provided under internal company operating procedures and publically available tariffs which are in compliance with applicable Wisconsin PSC orders and rules including:

**WI Chapter PSC 165  
STANDARDS FOR TELECOMMUNICATIONS SERVICE**

165.010	General.	165.066	Protection of utility facilities.
165.020	Definitions.	165.067	Interference with public service structures.
165.031	Retention of records.	165.070	Provision for testing.
165.032	Schedules to be filed with the commission.	165.071	Meter and recording equipment test facilities.
165.033	Exchange area boundaries.	165.072	Accuracy requirements.
165.034	Utility accidents and interruptions.	165.073	Initial test.
165.040	Meter reading records.	165.074	As-found tests.
165.041	Meter reading interval.	165.075	Routine tests.
165.042	Billing recording equipment.	165.076	Request tests.
165.043	Information available to customers.	165.077	Referee tests.
165.050	Customer billing.	165.078	Test records.
165.051	Deposits.	165.082	Traffic and operator rules.
165.052	Disconnection and refusal of service.	165.083	Answering time objectives.
165.0525	Deferred payment agreement.	165.084	Dial service objectives.
165.053	Customer complaints.	165.085	Interoffice trunks.
165.0535	Dispute procedures.	165.086	Transmission requirements.
165.054	Held applications.	165.087	Minimum transmission objectives.
165.055	Directories.	165.088	Public telephone service.
165.060	Construction.	165.089	Interruptions of service.
165.061	Maintenance of plant and equipment.	165.090	Protective measures.
165.062	Line fills.	165.091	Safety program.
165.063	Central office equipment.		
165.064	Interconnection service standards.		
165.065	Emergency operation.		

SAC: 330936

State: Wisconsin

Indianhead Tel Co

Form 481 Line No: 610 Description of Functionality in Emergency Situations

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Indianhead Tel Co pursuant to Wisconsin Public Service Commission rule “165.065 Emergency Operation” has:

- Established reasonable provisions to meet emergencies resulting from national security requirements, failures of lighting or power service, sudden and prolonged increases in traffic, illness or personnel, or from fire, storm, or similar emergencies. These provisions meet or exceed the rule requirement to provide:
  - Back up battery service in each central office.
  - Mobile power units that can be delivered on short notice and can be readily connected in offices without installed emergency power facilities.
- Informed employees as to procedures to be followed in the event of an emergency in order to prevent or mitigate interruption or impairment of telecommunications service, including rerouting of traffic around damaged facilities and the deployment of emergency power.

SAC: 330936

**REDACTED – FOR PUBLIC INSPECTION**

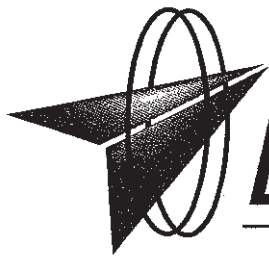
State: WI

Indianhead Tel Co

Form 481, Line No. 920, Tribal Government Engagement Obligation

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Indianhead Tel Co serves the Lac Courte Oreilles Band of Lake Superior Chippewa with phone and internet services. Letter were sent in 2014 requesting a conversation to discuss any and all options to better serve the tribal areas. Copies of the compliance filing associated with Federal dockets related to serving tribal areas was sent to the Lac Courte Oreilles Band of Lake Superior Chippewa. Additional follow up is planned for 2015.



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**BEVCOMM®**

123 West 7th Street • Blue Earth, MN 56013  
507-526-5156 • 1-877-864-5156 • Fax: 507-526-4963  
www.bevcomm.net

December 18, 2014

Lac Courte Oreilles Band  
Mr. Michael Ishan, Jr.  
13394 West Trepania Road  
Hayward, WI 54843

Re: FCC Order 11-161, DA 12-1165 Tribal Land Engagement.

Dear Sir:

On July 1, 2014, you were sent a letter from Tom Campbell from the accounting firm of Olsen Thielen and a copy of Indianhead Telephone Company's Form 481 High Cost and Low-Income Annual Report that was filed with the Federal Communications Commission (FCC).

As part of the USF/FCC Transformation order, the FCC adopted a Tribal government engagement requirement for all eligible telecommunications carriers that are currently serving or are seeking to serve tribal lands. For ease of reference I have enclosed a copy of the Public Notice that was released by the FCC Office of Native Affairs and Policy.

Indianhead Telephone Company d/b/a BEVCOMM serves a portion of the Lac Courte Oreilles Band Tribal area with telephone and internet service. I am writing you today to initiate conversation with your Tribal government and leaders to discuss any and all options to better serve your lands with high speed technology. Specifically, I would like to discuss your specific communications goals, needs and priorities. Once that is clear we can discuss the feasibility and sustainability of BEVCOMM deploying these services to your area.

Please contact me at your convenience:

James L. Beattie  
BEVCOMM  
123 W. Seventh Street  
Blue Earth, MN 56013  
(507) 526-1145  
jbeattie@bevcomm.com

Sincerely,

James L. Beattie  
Director of Government Relations & General Counsel

JLB: mo

Enclosure

*...your connection to the future!*



REDACTED – FOR PUBLIC INSPECTION

# PUBLIC NOTICE

Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

News Media Information 202 / 418-0500  
Internet: <http://www.fcc.gov>  
TTY: 1-888-835-5322

DA 12-1165

Released: July 19, 2012

**OFFICE OF NATIVE AFFAIRS AND POLICY,  
WIRELESS TELECOMMUNICATIONS BUREAU, AND  
WIRELINE COMPETITION BUREAU ISSUE FURTHER GUIDANCE ON  
TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION PROVISIONS OF THE  
CONNECT AMERICA FUND**

WC Docket Nos. 10-90, 07-135, 05-337, 03-109  
CC Docket Nos. 01-92, 96-45  
WT Docket No. 10-208  
GN Docket No. 09-51

## I. INTRODUCTION AND SUMMARY

1. By this Public Notice, the Federal Communications Commission's (FCC or Commission) Office of Native Affairs and Policy (ONAP), in coordination with the Wireless Telecommunications and Wireline Competition Bureaus (the Bureaus), provides further guidance on the Tribal engagement obligation adopted in the *USF/ICC Transformation Order*.<sup>1</sup> This document is intended to facilitate the required discussions between Tribal government officials and communications providers either currently providing or seeking to provide service on Tribal lands with the use of Universal Service Fund (USF) support.<sup>2</sup>

2. The broad goal of the guidance provided today, and future efforts to establish best practices, is to ensure the effective exchange of information that will lead to a common understanding between Tribal governments and communications providers receiving USF support, on the deployment and improvement of communications services on Tribal lands. The Tribal engagement obligation is intended to benefit Tribal government leaders, service providers, and consumers living on Tribal lands, ultimately providing greater connectivity to 21<sup>st</sup> century economic opportunities, education, health care, and public safety. This obligation is related to the very essence of universal service – facilitating and supporting connectivity to and from the most remote areas of our nation inures to the benefit of all. Requiring Tribal engagement is intended to begin and, in some cases, to strengthen, the dialogue between communications providers and Tribal governments. We anticipate that genuine dialogue and common understandings will ultimately lead to improvement of communications services on Tribal lands.

<sup>1</sup> See *Connect America Fund*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC 17663 at 17868-69, para. 637 (2011) (*USF/ICC Transformation Order*); *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 18, 2011).

<sup>2</sup> See *id.* In the context of the *USF/ICC Transformation Order*, "Tribal lands" is defined as "any federally recognized Indian tribe's reservation, pueblo or colony, including former reservations in Oklahoma, Alaska Native regions established pursuant to the Alaska Native Claims Settlements [sic] Act (85 Stat. 688), and Indian Allotments, see 47 C.F.R. § 54.400(e), as well as Hawaiian Home Lands—areas held in trust for native Hawaiians by the state of Hawaii, pursuant to the Hawaiian Homes Commission Act, 1920, Act July 9, 1921, 42 Stat. 108, *et seq.*, as amended." *Id.* at para. 125, n.197.



3. Good guidance, by definition, must include assistance on how to undertake an endeavor with an aim towards success. Any attempt at actual and meaningful dialogue must be predicated on the genuineness of the intent on both sides. This engagement cannot be viewed as simply another “check the box” requirement by either party. In many places, we expect that there are good and productive relationships between communications providers and Tribal Nations. To the extent that there might be existing differences, however, the parties should put aside those differences for the purposes of this engagement. This engagement process should not be approached as an adversarial undertaking. Instead, Tribal governments and carriers should take advantage of the engagement to improve communications and foster a greater common understanding of the factors necessary to deploy and sustain services on Tribal lands, as well as an honest dialogue to learn from one another what factors would lead to success in those endeavors. In all cases, a high degree of receptivity and responsiveness is necessary to achieve meaningful dialogue, as well as confidence in the reliability of information exchanged. Candid and sincere dialogue on both sides will minimize the possibility that unreasonable expectations by either party will derail common understandings and genuine solutions.

4. Creating a substantive, meaningful dialogue is an iterative process, one which, in certain regions, is at its earliest stages of development. In a similar sense, the further guidance contained in this Public Notice represents the first step in the Commission’s implementation of the Tribal engagement obligation. We recognize that priorities and plans of individual Tribal governments and individual service providers can vary greatly, as do the existing relationships between Tribal governments and carriers currently serving Tribal lands. Therefore, there is no one size fits all guidance that can be provided that will be universally applicable. As a result, the guidance provided herein is somewhat general in nature at this stage, but we anticipate that our guidance, as well as the development of best practices, will evolve over time based on initial implementation experiences and the feedback of both Tribal governments and communications providers.

5. ONAP, in coordination with the Bureaus, will track and monitor this feedback and will develop further guidance in the form of best practices based on actual experiences.<sup>3</sup> In an effort to further facilitate engagement efforts at this initial stage, ONAP will employ training and industry meeting opportunities, as well as its coordination events with Tribal Nations. These efforts will include, for example, working with national and regional communications industry associations and national and regional inter-Tribal government associations and organizations.<sup>4</sup> ONAP will focus particular efforts -- for example, by identifying commonalities, increasing efficiencies, building upon current working relationships, and engaging all regional stakeholders, as appropriate -- to foster engagement in states and regions in which Tribes and providers are particularly remote and in which Tribes are particularly numerous.<sup>5</sup> ONAP, in coordination with the Bureaus, will continue to serve as a resource for Tribal governments and communications providers and is always available for individually tailored assistance.

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<sup>3</sup> See *id.* at para. 637, n.1054 (directing ONAP, in coordination with the Bureaus, to develop best practices).

<sup>4</sup> See Letter from the Hon. Mark Begich, United States Senator, State of Alaska; the Hon. Lisa Murkowski, United States Senator, State of Alaska; and the Hon. Don Young, United States Congressman, State of Alaska, to the Hon. Julius Genachowski, Chairman, FCC, dated Feb. 22, 2012 (“[W]e request that you work with the tribal groups, carriers and the State of Alaska to clarify the tribal consultation requirements included in the reform order”). See also Letter of Becky Hultberg, Commissioner, Department of Administration, State of Alaska, to the Hon. Julius Genachowski, Chairman, FCC, dated February 17, 2012.

<sup>5</sup> For example, there are 229 federally recognized Tribes in Alaska, 108 in California, 38 in Oklahoma, 23 in New Mexico, and 21 in Arizona. See Federal Register Notice – Indian Entities Recognized and Eligible to Receive Services from the United States Bureau of Indian Affairs, 75 Fed. Reg. 60,810 (Oct. 1, 2010). See also Supplemental Federal Register Notice – Indian Entities 1 Page Recognized and Eligible to Receive Services from the United State Bureau of Indian Affairs, 75 Fed. Reg. 66,124 (Oct. 27, 2010).

## II. BACKGROUND

6. In the *USF/ICC Transformation Order*, the Commission adopted a Tribal engagement requirement for all eligible telecommunications carriers (ETCs) either currently serving or seeking to serve Tribal lands.<sup>6</sup> The Commission agreed with commenters that engagement between Tribal governments and communications providers is vitally important to the successful deployment of and provision of service on Tribal lands.<sup>7</sup>

7. The Commission therefore required, at a minimum, that ETCs demonstrate on an annual basis that they have meaningfully engaged with Tribal governments in their universal service supported areas.<sup>8</sup> At a minimum, the *USF/ICC Order* stated that such discussions must include: (1) a needs assessment and deployment planning with a focus on Tribal community anchor institutions; (2) feasibility and sustainability planning; (3) marketing services in a culturally sensitive manner; (4) rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (5) compliance with Tribal business and licensing requirements.<sup>9</sup> Failure to satisfy the Tribal engagement obligation will subject ETCs to financial consequences, including potential reduction in universal service support should they fail to fulfill their engagement obligations.<sup>10</sup>

8. In requiring Tribal engagement, the Commission did not intend to supplant its own ongoing obligation to consult with Tribes on a government-to-government basis, but instead recognized the important role that all parties play in expediting communications service to Tribal lands throughout the nation, including in Alaska and Hawaii.<sup>11</sup> ETCs will be required to submit to the Commission and appropriate Tribal government officials an annual certification and summary of their compliance with the Tribal government engagement obligation as part of the new Connect America Fund reporting requirements.<sup>12</sup> The Commission defined appropriate Tribal government officials as elected or duly authorized government officials of federally recognized American Indian Tribes and Alaska Native Villages.<sup>13</sup> For Hawaiian Home Lands, this engagement must occur with the State of Hawaii Department of Hawaiian Home Lands and the Office of Hawaiian Affairs.<sup>14</sup> The Commission delegated to ONAP, in coordination with the Bureaus, the authority to develop specific procedures regarding the Tribal

<sup>6</sup> See *USF/ICC Transformation Order*, 26 FCC Rcd at 17868-69, para. 637.

<sup>7</sup> *Id.* Mobility Fund and Tribal Mobility Fund Phase I winning bidders will be required to comply with this Tribal engagement obligation at the long-form application stage, in annual reports, and prior to any disbursement of support. *Id.* at para. 489. We note, however, that any such engagement must be done consistent with our auction rules prohibiting certain communications during the competitive bidding process. *Id.* at para. 810. In the *Further Notice of Proposed Rulemaking*, the Commission proposed to apply the same Tribal engagement obligation to Phase II of the general and Tribal Mobility Funds and sought comment on that proposal. *Id.* at para. 1166.

<sup>8</sup> *Id.* at para. 637. See also 47 C.F.R. §§ 54.313(a)(9), 54.1004(d), 54.1009.

<sup>9</sup> *Id.*

<sup>10</sup> See *USF/ICC Transformation Order*, 26 FCC Rcd at 17868-69, para. 637.

<sup>11</sup> *Id.*

<sup>12</sup> *Id.* See also *id.* at para. 575 (“Under this uniform framework, ETCs will provide annual reports and certifications regarding specific aspects of their compliance with public interest obligations to the Commission, USAC [the Universal Service Administrative Company], and the relevant state commission, relevant authority in a U.S. Territory, or Tribal government, as appropriate by April 1 of each year.”) See generally *id.* at paras. 576-606 (articulating specific reporting requirements). See also *Connect America Fund*, WC Docket No. 10-90 *et al.*, Order, 27 FCC Rcd 2142 at 2144-47, paras. 4-14 (2012) (*USF/ICC Clarification Order*) (revising and clarifying certain reporting obligations for recipients of Connect America Fund support).

<sup>13</sup> *USF/ICC Transformation Order*, 26 FCC Rcd at 17869, para. 637, n.1053.

<sup>14</sup> *Id.*

engagement process, as necessary.<sup>15</sup> The Commission also directed ONAP, in coordination with the Bureaus, to develop best practices regarding the Tribal engagement process to help facilitate these discussions.<sup>16</sup>

### **III. FURTHER GUIDANCE ON THE TRIBAL GOVERNMENT ENGAGEMENT OBLIGATION**

#### **A. Overview/General Guidance**

9. As stated above, the purpose of this guidance is to ensure the effective exchange of information between Tribal governments and communications providers concerning the deployment and improvement of communications services on Tribal lands throughout the nation, including in Alaska and Hawaii. This exchange of information should foster new opportunities for genuine dialogue that could achieve an alignment of interests and goals. Between certain carriers and Tribal governments, this will be an opportunity for introduction and dialogue in the first instance. In other parts of the country, this will be an opportunity for a new depth of dialogue and more meaningful interaction. An important goal of this guidance is the achievement of a level of engagement between principals on both sides that represents collaborative discussions and actual live conversation.<sup>17</sup> We encourage stakeholders to go beyond merely perfunctory exchanges of basic documents, simplistic sales or marketing presentations, or one-dimensional lists of demands.

10. It is imperative that this dialogue be undertaken at a level within communications providers and Tribal governments that is commensurate with this important engagement requirement. The discourse should be between decision-makers on both sides. While it may be necessary to include administrative staff on both sides to administer and maintain the continuity of relations, this engagement cannot be merely between sales and marketing individuals on one side and administrative staff or advisors on the other. The perspectives on needs, expectations, priorities, and abilities that would formulate meaningful exchange often can come only from those with the requisite authority to make decisions.

11. On the Tribal government side, there are certain actions that should be taken to best prepare for this valuable engagement. It is important for Tribal leaders to recognize and act upon this opportunity to become organized, maintain continuity, and provide for certainty in conveying their communications needs and priorities. The Commission has long recognized the right of sovereign Tribal governments “to set their own communications priorities and goals for the welfare of their membership.”<sup>18</sup> This is a critical time for Tribal Nations to update and make comprehensive their communications priorities and goals. Tribal governments should consider all community needs that would be supported by communications services. These might include, but are not limited to, anchor institutions, economic development, education, healthcare, and public safety. Each Tribal Nation has unique elements to its communications needs and priorities, but effectively articulating those needs is a critical first step in addressing them.

12. As Tribal government administrations change and develop, this is an important opportunity to demonstrate, both to communications providers and to the Commission, their continuity in communications priorities and goals. Certain Tribal governments have created their own governmental

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<sup>15</sup> *Id.* Although our focus here is on providing guidance, the Commission thus will consider the need for further guidance, or to clarify the existing rules regarding Tribal engagement or pursue new rules with specific procedures, if warranted in the future based on actual experiences and outcomes resulting from this guidance.

<sup>16</sup> *Id.* at n.1054.

<sup>17</sup> For example, engagement may occur when necessary by phone or video conference where extreme weather conditions and/or extreme remoteness are present.

<sup>18</sup> Statement of Policy on Establishing a Government-to-Government Relationship with Indian Tribes, 16 FCC Rcd 4078, 4080-81 (2000) (*Tribal Policy Statement*).



offices and commissions to interact with the FCC and communications providers. Others have designated key members of their Tribal Councils to lead their communications prerogatives for their governments, in effect creating communications committees on their Councils. Other Tribes have yet to organize their governmental or administrative systems with respect to communications services. This engagement obligation necessitates a level of organization within the Tribal government that can convey both a high degree of certainty in the communications priorities of the Tribal Nation and maintain the continuity of those priorities to the greatest extent possible in a governmental environment that, by definition, changes over time. Updating Tribal communications priorities and goals, and ensuring the establishment of effective organizational structures concerning communications issues, are important first steps. However, ETCs must begin the Tribal engagement process this year to be able to report on meaningful engagement by July 1, 2013.<sup>19</sup> Therefore, Tribal governments may need to take interim measures in the short term as they consider establishing new or modified communications goals and priorities.

13. Tribal Nations also should immediately begin preparations to receive, record, and process this engagement dialogue and any related correspondence. Specific efforts should be made to chronicle details of engagement dialogue sessions. Recordkeeping should be established for documentation of the initial contact, any follow-up communications, and the resulting annual certification documentation. Records should include, for example, a summary of all verbal interactions as well as copies of all electronic and hard copy communications.<sup>20</sup>

14. Similarly, communications providers should take immediate steps to prepare for and initiate engagement with the Tribal governments whose lands they serve. Certifications articulating the steps taken to comply with the annual Tribal engagement obligation in 2012 are due on July 1, 2013 and each year thereafter.<sup>21</sup> That is, the Tribal engagement obligation must be fulfilled by the end of each calendar year. Communications providers should, for example, take immediate steps to establish a lead and/or a team within their companies and to identify the appropriate Tribal government leaders with whom they will initiate the engagement process. The National Congress of American Indians (NCAI)<sup>22</sup> maintains a routinely updated and comprehensive directory of American Indian Tribal and Alaska Native Village government leaders, addresses, and telephone numbers. The NCAI Tribal directory can be sorted by geographical area and can be found at <http://www.ncai.org/tribal-directory>.<sup>23</sup> Where needed, ONAP also will serve as a resource for communications providers and Tribal governments.

15. In addition, communications providers should retain copies of all communications with Tribal leaders they would need in order to demonstrate compliance with their annual certification requirement. In the event that a Tribal government does not respond to repeated efforts to engage, the provider should document all attempts at engagement and certify to that effect. As with the entire engagement process, reasonableness should prevail. As a general matter, we expect that a provider would not be penalized for a failure to respond on the part of a Tribal Nation, if the provider can demonstrate repeated good faith efforts to meaningfully engage with the Tribal government.

<sup>19</sup> See *Connect America Fund*, WC Docket No. 10-90 *et al.*, Third Order on Reconsideration, FCC 12-52 at para. 10 (rel. May 14, 2012) (*Third Reconsideration Order*) (changing the filing deadline from April 1 to July 1).

<sup>20</sup> For example, all ETCs receiving high-cost are now subject to a 10-year document retention requirement. See *USF/ICC Transformation Order*, 26 FCC Rcd at 17864, para. 620. See also *Third Reconsideration Order*, FCC 12-52 at para. 14.

<sup>21</sup> See *Third Reconsideration Order*, FCC 12-52 at para. 10. See also 47 C.F.R. §§ 54.313, 54.1009..

<sup>22</sup> NCAI is the nation's oldest, largest, and most representative inter-Tribal government and communities organization, representing American Indian Tribes and Alaska Native Villages.

<sup>23</sup> For a listing of all federally recognized American Indian Tribes and Alaska Native Villages, see [www.bia.gov/cs/groups/xofa/documents/document/idc012038.pdf](http://www.bia.gov/cs/groups/xofa/documents/document/idc012038.pdf). ONAP, in coordination with the Bureaus, will endeavor to provide additional resources to Tribal governments and carriers to help facilitate this engagement, including the possibility of using the Commission's website as a repository of information.

**B. Needs Assessment and Deployment Planning**

16. Tribal governments play a vital role in identifying and serving the needs and interests of their local communities, often in remote, insular, cyclically impoverished communities with a historic lack of critical infrastructure. Tribal government leaders are intimately acquainted with their members' needs and have valuable insight into how to meet them. "Tribal-centric" business models – those that actively engage the Tribe, its core community institutions, and members in deployment and adoption planning – have a greater chance of establishing sustainable services on Tribal lands.<sup>24</sup> Communications providers also have experience and a valuable perspective on the challenges, economics, and other realities of providing service to remote, low-income, and underserved regions of the country, including certain Tribal lands.

17. The Tribal engagement obligation provides Tribal governments and communications providers alike with a new opportunity – the opportunity to have a genuine conversation about communications needs and deployment planning on Tribal lands. When telephone service was originally deployed, there was no such obligation and, as a result, in many instances, Tribal needs and carrier deployment efforts were not aligned. The Tribal engagement obligation affords both Tribal governments and communications providers the opportunity to move forward with a shared vision. This will only occur, however, if Tribal governments and communications providers alike take advantage of this historic opportunity to improve the communications landscape on Tribal lands.

18. To that end, Tribal governments should come to the table with a serious, well-thought out assessment of the Tribes' communications needs. Issues that Tribal governments should consider include, for example, the Tribe's communications goals, needs, and priorities, as well as what the Tribe intends to do with communications services (e.g., provide connectivity to those living on Tribal lands, encourage economic opportunity). Tribal governments should also assess what core community or anchor institutions are central to deployment, and what in the nature and operations of these institutions is relevant to the need for communications services. In addition, Tribal governments should consider whether there are economic factors and possibly Tribally-driven opportunities that will assist in making the business case for deployment on Tribal lands, as well as opportunities where Tribal governments and communications providers can partner. In analyzing and discussing communications goals, needs, and priorities, Tribal governments should note that recipients of Connect America Fund (CAF) support, including the Mobility Fund, are subject to public interest obligations, as established in the *USF/ICC Transformation Order*.<sup>25</sup>

19. Similarly, communications providers should come to the table ready to articulate their deployment priorities, the process by which they arrived at these priorities, and their initial plans for deployment on Tribal lands. Issues that communications providers should be prepared to discuss include, for example, the services they currently deploy, and what services they intend to deploy, on Tribal lands. Providers should also be prepared to discuss their timelines for the provision of services not currently available on Tribal lands, as well as their priorities in terms of service and the factors that led them to prioritize deployment to particular areas. Communications providers should also identify any opportunities they envision to partner with Tribal governments.

**C. Feasibility and Sustainability Planning**

20. Feasibility and sustainability planning for communications services on Tribal lands presents issues of concern for both Tribal governments and communications providers. Tribal governments generally want services rapidly deployed for their members to support the economic, educational, public safety, and health care opportunities that communications services afford. Communications providers

<sup>24</sup> See *Improving Communications Services for Native Nations*, CG Docket No. 11-41, Notice of Inquiry, 26 FCC Rcd 2672, 2679-80, para. 12 (2011) (*Native Nations NOI*).

<sup>25</sup> See *USF/ICC Transformation Order*, 26 FCC Rcd at 17691-17709, paras. 74-114.

generally want business models that will be practical in terms of build out, and viable in terms of revenue flow and quality of service. While some commonalities likely exist, we believe there are many differences from one provider to another and from one Tribal government to another. The Tribal engagement obligation affords both parties the opportunity to share specific perspectives and information and to begin charting a path forward to address feasibility and sustainability in coordination with one another.

21. Tribal lands nationwide face some of the greatest challenges to the feasibility and sustainability of a 21<sup>st</sup> century communications infrastructure, including rugged and remote terrain and often endemic levels of poverty. Therefore, communications build out plans based purely on population density or proximity to other robust networks can face major cost benefit analysis challenges. Tribal government leaders, who are largely responsible for managing a wide array of government services and economic opportunities for their communities, are uniquely situated to advise communications providers of the specific challenges associated with deploying and sustaining a communications network on their lands. The Tribal engagement obligation will facilitate discussion between Tribal government leaders and communications providers, affording providers an important opportunity to draw upon the knowledge gained to inform and coordinate their feasibility and sustainability planning.

22. Tribal Nations should be prepared to discuss any additional resources they may bring to bear in feasibility and sustainability planning for communications services, because many federal grant or loan programs provide direct access to, or particular standing for, Tribal Nations and their entities. That is, there are federal government programs that support infrastructure deployment and support the economic, health, safety, and welfare missions in Native communities—the very same priorities for the deployment of robust communications networks on Tribal lands. For example, Tribes may be considering business ventures that would benefit from coordination on communications planning at the outset. Together, providers and Tribal Nations have the opportunity to discuss how to coordinate in planning, providing, and meeting the expenses for communications services on Tribal lands.

23. When addressing the issues of sustainability on Tribal lands, one must also calibrate expectations and develop an awareness of the unique nature of Tribal communities. Issues such as cyclical poverty, remoteness, and deployment priorities all inform the potential sustainability and ultimate profitability of a particular communications model on Tribal lands. That is, it can take a longer period of time to develop a sustainable enterprise on many Tribal lands. Increased coordination between Tribal governments and communications providers on specific elements of feasibility will heighten the chances of ultimate sustainability for communications business models on Tribal lands.

#### **D. Marketing Services in a Culturally Sensitive Manner**

24. As noted above, for the purposes of the USF/ICC proceeding and, therefore, the Tribal engagement obligation, Tribal lands are comprised of the lands of the approximately 566 federally recognized American Indian Tribes and Alaska Native Villages, as well as Hawaiian Home Lands.<sup>26</sup> Tribal lands represent a rich and diverse array of cultural heritage, history, practices, and pride. Outside the context of Tribally owned and operated providers, however, seldom have these cultural factors been fully considered in the marketing and deployment of communications services on Tribal lands. The Tribal engagement obligation provides Tribal governments and communications providers with the opportunity to discuss and explore ways in which they can coordinate or partner to ensure that services are marketed in a manner that will relate directly to the community, resonate with consumers, and stimulate increased adoption of services on Tribal lands.

25. Issues that Tribal governments and communications providers may wish to discuss include the tailoring of service offerings to the community through, for example, the feasibility of a local presence in the community. For example, locating a retail presence within a Tribal community and employing

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<sup>26</sup> See *supra* n.2.



members of that community may increase awareness of and sensitivity to local cultural and communications needs. Providers and Tribal governments also may wish to discuss whether developing materials, separately or jointly, specific to the Tribal community would be beneficial to either the provider or consumers on Tribal lands. In addition, providers and Tribal governments also may wish to discuss what other elements of their respective organizations may need to be engaged. For Tribal governments, this may mean administrative planning, community service, and other governmental offices. For providers, this may mean customer service, technical assistance, and commercial business divisions. Through a heightened mutual understanding of one another's needs, we anticipate that Tribal governments and communications providers may discover opportunities for working together that will yield benefits to all. Studies indicate that these efforts present genuine opportunities for success, because where Native Nations and their community members have access to broadband, their rates of Internet use are on par with, if not higher than, national averages.<sup>27</sup>

**E. Rights of Way and Other Permitting and Review Processes**

26. There are numerous regulatory processes with which service providers must comply in order to provide communications services on Tribal lands, including rights of way, land use permitting, facilities siting, and environmental and cultural review processes.<sup>28</sup> Certain of these processes involve other federal agencies, such as the Department of Interior's Bureau of Indian Affairs (BIA), and failure to comply with these processes may result in a finding of trespass. Given the widely varying circumstances on different Tribal lands, a one size fits all approach is not appropriate here. Instead, in the context of the Tribal engagement obligation, the common goal for Tribal governments and communications providers should be one of greater mutual understanding about the relevant rights of way and other permitting and review processes on Tribal lands and a plan for informing communications providers of procedures in a helpful and instructive manner, designed to bring companies into compliance, where applicable.

27. To that end, Tribal governments and communications providers should come to the table prepared to discuss the relevant rights of way and other permitting and review processes, as well as the challenges associated with these processes. For example, with respect to the BIA's appraisal process for rights of way, dialogue that prioritizes early notification might expedite Tribal governments' consultations with BIA and consent.<sup>29</sup> Tribal governments should have a comprehensive list of all processes with which communications providers serving their Tribal lands are required to comply, such as rights of way, land use permitting, facilities siting, and environmental and cultural review processes. Communications providers should have documentation of any and all processes with which they currently comply. All of this information will provide the foundation for a substantive discussion of all requirements and steps for moving forward together.

**F. Compliance with Tribal Business and Licensing Requirements**

28. As sovereign institutions, Tribal governments have the authority to impose Tribal business and licensing requirements on all entities doing business on their lands. While the type and form of requirements may vary greatly from one Tribal land to another, Tribal business and licensing requirements include business practice licenses that Tribal and non-Tribal business entities, whether located on or off Tribal lands, must obtain upon application to the relevant Tribal government office or division to conduct any business or trade, or deliver any goods or services, to the Tribe, Tribal members, or Tribal lands. The form of these licenses vary greatly, including certificates of public convenience and necessity, Tribal business licenses, master licenses, and other related forms of Tribal government

<sup>27</sup> See Traci L. Morris Ph.D., Native Public Media and Sascha D. Meinrath, New America Foundation, NEW MEDIA, TECHNOLOGY AND INDIAN USE IN INDIAN COUNTRY: QUANTITATIVE AND QUALITATIVE ANALYSES (Nov. 19, 2009) (NPM/NAF New Media Study).

<sup>28</sup> See *USF/ICC Transformation Order*, 26 FCC Rcd at 17868-69, para. 637.

<sup>29</sup> See generally 25 C.F.R. Part 169 – Rights-of-Way Over Indian Lands.

licensure.<sup>30</sup>

29. As part of the Tribal engagement obligation, Tribal governments and communications providers should come to the table prepared to discuss in detail the relevant Tribal business and licensing requirements. Tribal governments should have a comprehensive list of any such requirements applicable to the provision of communications services. They should be prepared to provide an explanation of precisely what all such requirements entail, including specific application procedures and timeframes, as well as the governmental offices involved in the licensing process. Communications providers should be prepared to provide evidence of compliance with any Tribal business practice licenses with which they currently comply for that Tribe. Consistent with the discussion above regarding rights of way and other permitting and review processes, the common goal here should be one of greater mutual understanding about the relevant Tribal business licensing requirements and a plan for bringing companies into compliance, where applicable.

#### **IV. CONCLUSION**

30. In conclusion, the Tribal engagement obligation represents an opportunity for Tribal governments and communications providers to coordinate on many issues critical to the deployment and adoption of communications technologies on Tribal lands. As discussed in the introduction, this guidance represents the first step in an iterative process. That is, this guidance will evolve over time based on initial experiences and feedback from Tribal governments and communications providers. In an effort to identify commonalities, increase efficiencies, and build upon current working relationships, ONAP will engage all regional stakeholders, as appropriate, and will respond to needs articulated by communications providers and Tribal governments.

#### **V. CONTACTS**

31. For further information concerning this guidance, contact the offices listed below:

**Office of Native Affairs and Policy**

Geoffrey Blackwell at (202) 418-3629

Irene Flannery at (202) 418-1307

**Wireless Telecommunications Bureau**

Sue McNeil at (202) 418-7619

**Wireline Competition Bureau**

Joseph Cavender at (202) 418-1548

**- FCC -**

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<sup>30</sup> See *USF/ICC Transformation Order*, 26 FCC Rcd at 17868-69, para. 637, n.1052.



Line 1010 – Description of Voice Services Rate Comparability: Provide a detailed description of how your pricing of fixed voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as published annually by the Wireline Competition Bureau, as required in 47 C.F.R. § 54.313(a)(10).

On April 16, 2015 the Wireline Competition Bureau announced results of the Urban Rate Survey for Voice Services as part of FCC Public Notice DA 15-470. Referenced in this public notice are the results required to meet the rate comparability as noted:

“Based on the survey results, the reasonable comparability benchmark for voice services is \$47.48.<sup>3</sup>

<sup>3</sup> Id. at 17694, para. 84.”

As required Indianhead Tel Co hereby certifies that its current fixed voice services for residential subscribers as defined in the USF/ICC Transformation Order is below \$47.48.

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- Indianhead Tel Co offers Lifeline Service credit according to basic service requirements listed in Wisconsin Administrative Code 160.03 and 160.04:

**PSC 160.03 Essential telecommunications services.**

- 1) Each local exchange service provider shall make available to all its customers at affordable prices all essential telecommunications services.
- 2) "Essential telecommunications services" means all the following:
  - (a) Single-party voice-grade service with:
    1. Line quality capable of facsimile transmission.
    2. Line quality capable of data transmission as specified in s.PSC 160.031.
    3. Dual-tone multi-frequency touch tone and rotary pulse dialing operability.
    4. Access to emergency services numbers and 9-1-1 operability where requested by local authorities.
    5. Equal access to interlata interexchange carriers subject to federal communications commission orders and rules.
    6. Equal access to intralata interexchange carriers pursuant to schedules, terms and conditions imposed by commission orders and rules.
    7. Single party revertive calling, if 2 or more pieces of customer premises equipment can be simultaneously active on the line or channel being used by the customer.
    8. A reasonably adequate number of calls within a reasonably adequate local calling area as defined by the commission.
    9. Connectivity with all public toll, local, wireline and wireless networks, and with various internet service providers.
    10. Telecommunications relay service to facilitate communication between teletypewriter users and non-teletypewriter users.
    11. Access to operator service.
    12. Access to directory assistance.
    13. Toll blocking, 900 and 976 number blocking and extended community calling blocking options as specified in s.PSC 160.04.
    14. Intercept and announcements for vacant, changed, suspended and disconnected numbers in oral and TTY-readable formats.
    15. A directory listing with the option for non-listed and non-published service.
  - (b) Annual distribution of a local telephone directory in accordance with s.PSC 165,955.
  - (c) Timely repair.

**PSC 160.04 Toll blocking.**

- (1) BLOCKING OBLIGATIONS. Every local exchange service provider in the state shall offer the capability to block all long distance calls and, separately, the capability to block 900 and 976 number calls and the capability to block extended community calling unless a timely waiver has been granted to the local exchange service provider by the commission.

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**(2) CHARGES.** Blocking shall be without monthly or nonrecurring charge to low-income customers and at no charge other than for second and subsequent service activation orders for other residential and standard business line customers.

**(3) EMERGENCY SERVICE.** Blocking shall not prevent the customer from reaching the emergency service numbers appropriate for the customer's location.

- Indianhead Tel Co Lifeline service offerings are listed in their Local Service Tariff Section 1, Sheets 1, 3.1, 12 - 15 (attached).
  - The Local Service Tariff is on file with the Wisconsin Public Service Commission.
  - All Lifeline subscribers must meet the terms and conditions of Federal Lifeline Eligibility Rules.
- 

Indianhead Tel Co does adhere to all Federal Lifeline eligibility rules and regulations as well as Wisconsin Administrative Code "Chapter PSC 160" which states:

**PSC 160.02 Definitions.**

**8)** "Low-income" means a household that receives benefits from one or more of the following programs:

- (a)** Wisconsin Works
- (b)** Medical Assistance
- (c)** Supplemental security income
- (d)** Food stamps
- (e)** The low income household energy assistance program
- (f)** The Wisconsin homestead tax credit
- (g)** Badger care
- (h)** As approved by the commission, other state or federally administered programs for households with income levels equal to or less than 200% of the poverty line.

**PSC 160.06 Eligibility for low-income programs.**

**(1) LOW-INCOME ASSISTANCE ELIGIBILITY.** Local exchange service providers shall verify an applicant's eligibility for low-income assistance programs by making timely queries of the applicable databases of the Wisconsin department of workforce development, the Wisconsin department of revenue, or other state agencies. Applicant eligibility shall be verified by finding the applicant to be any of the following:

- (a)** An active client of at least one of the programs listed in s. PSC 160.02(8).
- (b)** A member of the active client's household whose low income qualifies the client for benefits under at least one of the programs listed in s. PSC 160.02(8).
- (c)** A recipient of the Wisconsin homestead tax credit for the most recently completed tax year. If the applicant's tax filing for the most recently completed tax year has not been posted to the records of the Wisconsin department of revenue and if application for low-income assistance is made on or before June 30<sup>th</sup>, then the tax year prior to the most recently completed tax year may be used to determine eligibility.

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- (2) **ELIGIBILITY RECONFIRMATION.** Eligibility shall be reconfirmed on at least an annual basis for all customers receiving lifeline assistance.
- (3) **ELIGIBILITY INQUIRY.** Local exchange service providers shall inquire of the customer regarding eligibility of that customer for low-income programs on each order for initial or moved residential service and, orally or in writing, in the first contact with a customer during a year concerning disconnection or payment arrangements.
- (4) **QUERY AUTHORIZATION.** Local exchange service providers shall comply with client authorization requirements of the Wisconsin department of workforce development, the Wisconsin department of revenue, or other state agencies for database queries necessary for eligibility verification. Customers shall complete and remit any reasonably required query authorization forms or forfeit eligibility.
- (5) **EXCEPTIONS.** Lifeline and Link-Up programs are not available to customers who are dependents for federal income tax purposes as defined in 26 USC 152 (1986), unless the customer is more than 60 years of age.

**PSC 160.062 Lifeline program.**

- (1) All local exchange service providers shall offer a lifeline monthly rate to all qualified low-income customers.
- (2)
  - (a) The lifeline monthly rate includes single-party residential service, touch-tone service, any 9-1-1 charges billed on the telephone bill, the federal subscriber line charge and 120 local calls, excluding extended community calling calls.
  - (b) The lifeline monthly rate shall be the total of the residential monthly rates for the items in par. (a) minus \$7 or, if the total of the monthly residential rates for the items in par. (a) is greater than \$22, the lifeline monthly rate shall be \$15.
  - (c) Notwithstanding par. (b), in no case shall the lifeline monthly rate be less than \$3 or more than \$15.
- (3) The lifeline monthly rate may appear as a credit against the full standard tariffed rate on a customer's bill or as a special rate designation. Whenever possible, the lifeline rate shall begin to appear on an eligible customer's bill on the next bill date following the date of application for lifeline assistance. If the rate does not begin to appear on the next bill date, when it does appear back credit will be given. In cases where a customer's eligibility date as found in the records of the Wisconsin department of workforce development, the Wisconsin department of revenue, or other state agencies precedes the last bill date prior to application, credit shall also be given for one month's prior bill.
- (4)
  - (a) Eligibility for lifeline assistance continues until the next bill date following a failure to meet eligibility requirements.
  - (b) When the low income household energy assistance program is one of the customer's qualifying income assistance programs, the eligibility for lifeline assistance shall continue until the bill date in the next December following the close of the heating season. At that time, lack of eligibility shall be re-verified by the local exchange service provider before removing the lifeline assistance from the customer's bill.

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- (c) When the homestead tax credit is one of the customer's qualifying income assistance programs, the eligibility for lifeline assistance continues until the bill date in the next June following the end of the tax year. At that time, lack of eligibility shall be re-verified by the local exchange service provider before removing the lifeline assistance from the customer's bill.
- (5) Local exchange service providers may receive reimbursement from the universal service fund for 100% of that portion of the standard authorized rate for service which is in excess of the amount of the lifeline monthly rate which is eligible for reimbursement from federal lifeline program funds.
- (6) Customers eligible for lifeline or link-up America assistance may not be charged a deposit for service if they voluntarily accept toll blocking, may not be requested to pay in advance for more than one month's local service bill, and may not be disconnected from local service for nonpayment of toll charges billed by the local exchange service provider. Customers that otherwise would be subject to disconnection may be counseled to accept toll blocking.
- (7) A local exchange service provider acting under the limited conditions specified in its commission approved telecommunications customer assistance program under s. PSC 160.08 may impose toll blocking or restriction on lifeline customers.

**PSC 160.063 Outreach for low-income assistance programs.**

- (1) Funding shall be available to fund collaborative partnerships between community-based organizations and telecommunications providers to increase participation of the eligible populations in the universal service fund low-income support programs.
- (2) Funding from the universal service fund for these collaborative efforts shall not exceed \$250,000 in one year.
- (3) The commission shall annually review and grant funding based on complete responses to a request for proposals. Funding shall be limited to not more than 6 projects with at least one project focused statewide and one project focused on the Milwaukee area, if feasible.
- (4) The commission shall contract for an evaluation of the effectiveness of this program in promoting enrollment in low-income programs and subscribership to telephone service to be completed within 2 years of May 1, 2000. The cost of this evaluation shall not exceed \$25,000. This \$25,000 shall be included as part of the \$250,000 maximum total funding available under this section during the year in which the evaluation occurs.

**PSC 160.08 Telecommunications customer assistance program.**

The commission may authorize individual telecommunications providers to establish telecommunications customer assistance programs that meet authorized goals and objectives for increasing or stabilizing subscription levels for non-optional, essential telephone service within its service territory or to address avoidance of disconnection or limitation of service to low-income households with payment problems. Such programs may allow a provider to not make available certain essential services, as defined in s. PSC 160.03(2), in order to preserve at least minimal telephone service to certain low-income households with payment problems. The commission shall determine on a case-by-case basis whether or not a telecommunications customer assistance program may receive universal service fund monies.

Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN  
TELEPHONE RATE FILE

**INDIANHEAD TELEPHONE COMPANY**

Name of Utility

Exchange	<u>All</u>
Section No.	<u>1</u>
Sheet No.	<u>1</u>
Amendment No.	<u>608</u>

**EXCHANGE RATES**

Local Rates

	<u>Authorized Rate</u>	<u>TEACH Assessment</u>	<u>Continuing Credit*</u>
Business/Key Systems Access Line	\$22.50	\$0.52	\$0.00
Residential Access Line	\$20.46 (I)	\$0.52	\$0.00
PBX Trunks	\$24.40	\$0.52	\$0.00

(\*) Credits authorized for USC support

NOTE: Local service rates for all Indianhead exchanges moved to this sheet.

Issued \_\_\_\_\_ Applicable to bills rendered on and after June 1, 2014

PSCW Authorization by order No. \_\_\_\_\_

Letter \_\_\_\_\_

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Form 10 Rate

## PUBLIC SERVICE COMMISSION OF WISCONSIN TELEPHONE RATE FILE

INDIANHEAD TELEPHONE COMPANY

Name of Utility

Exchange	ALL
Section No.	1
Sheet No.	3.1
Amendment No.	30

### EXCHANGE RATES

#### EXTENDED AREA SERVICE (EAS)

##### A. DESCRIPTION

1. Exchange Service, consisting of Network Access Lines and flat rate service, is provided within a defined Local Service Area. The Local Service Area for a Network Access Line(s) is the Exchange Area. (T)
2. Extended Area Service (EAS) defines the Local Service Area within which Telecommunications Service Customers in two different Exchange Areas may call each other at the charges and/or rates for a local call. (T)
3. The Extended Area Service (EAS) arrangements for the Company's Exchanges are: (T)

<u>From</u>	<u>To</u>
Exeland	Radison
Radison	Exeland/

Issued \_\_\_\_\_ Applicable to bills rendered on and after 10-1-99

PSCW Authorization by order No. \_\_\_\_\_

Letter SEP 13 1999



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Form 10 Rate

## PUBLIC SERVICE COMMISSION OF WISCONSIN TELEPHONE RATE FILE

INDIANHEAD TELEPHONE COMPANY

Name of Utility

Exchange	ALL
Section No.	1
Sheet No.	12
Amendment No.	

### LIFELINE SERVICE

#### A. Description

1. Lifeline Service is a residence service offering that provides a discounted monthly rate to customers who qualify for low income assistance programs as defined in s. PSC 160.02(8), Wis Adm. Code.
2. Lifeline Service provides a monthly discount to eligible residence customers that have a network access line (including Extended Area Service), touch-tone service, 911 Service (billed on the customer's telephone bill), and the End User Common Line Charge (EUCL). If the customer has measured service, 120 local calls are provided. Extended Community Calling (ECC) Service is not included in Lifeline Service.
3. Lifeline Service monthly rates for residence customers are established according to s. PSC 160.062(1), (2) and (3), Wis Adm. Code.

#### B. Regulations

1. Lifeline Service is only available for residence customers with a single line network access line.
2. Lifeline Service is not available to customers who are dependents for federal income tax purposes as defined in 26 USC 152 (1986), unless the customer is more than 60 years old.
3. Lifeline Service customers must complete and remit any required query authorization forms requested by the Company or forfeit eligibility for Lifeline Service.
4. Eligibility for Lifeline Service must be verified by the Company by finding the Social Security Number and name of the listed customer in active records of the Department of Workforce Development or the Wisconsin Department of Revenue.

(C)

(C)

(C)

Issued \_\_\_\_\_ Applicable to bills rendered on and after \_\_\_\_\_ 1-01-98

PSCW Authorization by order No. \_\_\_\_\_

Letter \_\_\_\_\_

JAN - 6 1998



Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN  
TELEPHONE RATE FILE

INDIANHEAD TELEPHONE COMPANY

Name of Utility

Exchange	ALL
Section No.	1
Sheet No.	13
Amendment No.	

LIFELINE SERVICE

B. Regulations (Cont'd)

5. Reconfirmation of Eligibility for Lifeline Service

- a. Reconfirmation of eligibility for Lifeline Service will be done at least once each year.
- b. If a customer cannot reconfirm eligibility for Lifeline Service, eligibility will continue until the next bill date following failure to meet the eligibility requirements.
- c. When the Low Income Household Energy Assistance Program is one of the customer's qualifying low income assistance programs, the eligibility for Lifeline Service shall continue until the bill date in the next December following the close of the heating season. At that time, if eligibility cannot be re-verified by the Company, Lifeline Service will be removed from the customer's bill.
- d. When the Wisconsin Homestead Tax Credit is one of the customer's qualifying low income assistance programs, the eligibility for Lifeline Service shall continue until the bill date in the next June following the end of the tax year. At that time, if eligibility cannot be re-verified by the Company, Lifeline Service will be removed from the customer's bill.
- e. Eligibility confirmation through receipt of the Wisconsin Homestead Tax Credit will not become effective until the date set by the Commission upon its acknowledgment that an acceptable data base query process is in place.

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Form 10 Rate

## PUBLIC SERVICE COMMISSION OF WISCONSIN TELEPHONE RATE FILE

INDIANHEAD TELEPHONE COMPANY

Name of Utility

Exchange	ALL
Section No.	1
Sheet No.	14
Amendment No.	56

### LIFELINE SERVICE

#### B. Regulations (Cont'd)

(D)

(D)

#### C. Rates

Lifeline Service will appear as a credit or a rate reduction on the customer's bill.

Issued 12-14-01 Applicable to bills rendered on and after 1-1-02

PSCW Authorization by order No. JAN - 4 2002  
Letter

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Form 10 Rate

## PUBLIC SERVICE COMMISSION OF WISCONSIN TELEPHONE RATE FILE

INDIANHEAD TELEPHONE COMPANY

Name of Utility

Exchange ALL

Section No. 1

Sheet No. 15

Amendment No. 58

### LIFELINE SERVICE

#### C. Rates and Charges

The applicable monthly rate for Lifeline Service is determined by the sum of the rates for the services specified in 1. following and applying a credit based on the sum of the credits as specified in 2. following.

##### 1. Lifeline Service

Residence Network Access Line (including EAS) at the rate specified elsewhere in this tariff.

Touch Calling Service (if applicable) at the rate specified elsewhere in this tariff.

911 Service (if billed on the Customer's telephone number) at the rate specified elsewhere in this tariff.

End User Common Line (EUCL) Charge.

##### 2. Lifeline Service Credits

End User Common Line Charge (EUCL) as specified in the NECA Tariff.

Federal Lifeline support credit as specified by the Federal Communications Commission (FCC) for Universal Service Support for Low-Income Consumers.

State Lifeline support credit as specified by the Public Service Commission of Wisconsin in Wis. Admin. Code PSC 160.062.

##### 3. Lifeline Service monthly credit

The Lifeline Service monthly credit is \$10.00.

(I)

Issued 7-1-03 Applicable to bills rendered on and after 7-1-03

PSCW Authorization by order No. \_\_\_\_\_

Letter JUL 15 2003

SAC: 330936

**REDACTED – FOR PUBLIC INSPECTION**

State: WI

Indianhead Tel Co

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

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Indianhead Tel Co hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

SAC: 330936

**REDACTED – FOR PUBLIC INSPECTION**

State: WI

Indianhead Tel Co

Response to Line 3012 – Progress Report on 5 Year Plan – Community Anchor Institutions (47 CFR §54.313(f)(1)(ii))

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Indianhead Tel Co has no newly served community anchor institutions that began receiving broadband in the preceding calendar year.

SAC: 330936

**REDACTED – FOR PUBLIC INSPECTION**

State: WI

Indianhead Tel Co

Form 481 Line No. 3026

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**ATTACHMENT REDACTED IN ENTIRETY**